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# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES Antimicrobials Division

### August 14, 2003

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: SIS AM500

DP Barcode: 292204

Manufacturing-use [] OR

**Action Code: 186** 

Reg. No.: 75174-E

End-use Product [X]
AD Due Date: 10/22/03

TO:

Velma Noble

PM Team 31

FROM:

Bipin C. Gandhi, Chemist

Product Science Branch, CT Team

Antimicrobials Division (7510C)

THRU:

Karen P. Hicks, CT Team Leader

Product Science Branch

Antimicrobials Division (7510C)

THRU:

Michele E. Wingfield, Chief

**Product Science Branch** 

Antimicrobials Division (7510C)

**Product Formulation** 

Active Ingredient(s) 3-(trimethoxysilyl) propyldimethyl octadecyl

ammonium chloride 5.0% by wt.

BACKGROUND: This is an end-use new submission.

## Manufacturing process information not included.

### FINDINGS:

- 1. This product is an end-use product and it is formulated from 75174-R. Therefore, this product can not be reviewed until and unless all the deficiencies for 75174-R are cleared and it is registered.
- 2. Registrant has reported on CSF block 13a the amount of an and also for its alternate. This is not correct, either remove one of the numbers or add parenthesis for one of them to correctly add to for block 17 of CSF.
- 3. The pH range of 5-6 is reported under block 8 of CSF. However, under data matrix the pH is reported as 6.5 and 4.3 (two different pH on two different data matrix sheets). Make all necessary corrections.
- 4. Please report the density in lbs/gal. in the column 8 of CSF.
- 5. The analysis of 3-(trimethoxysilyl) propyldimethyl octadecyl ammonium chloride under Table 1 and 2 for SiS AM 500 ( I assume SiS AM 500 is same as SiS AM 5001) is between 4.88 to 4.99. However, the label claim is 5.00. Make necessary adjustments in formulations.

### **RECOMMENDATIONS:**

1. The Agency can not approve this submission until the technical product 75174-R is registered and all other discrepancies as reported under findings are corrected and submitted.

Reg. No 75174-G

MRID Reviewed: 460230-01, -02, and -03.